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Chairman Michael Powell
Federal Communications Commission
445 12th St. S.W.
Washington, DC 20554

Dear Chairman Powell,

I am writing regarding the FCC's proposed rulemaking MB Docket No. 04-232. First, I would like to comment that I completely agree with the public and FCC's notion that a few radio and television stations are pushing the limits of indecency on the airwaves. While I do not condone this and find it personally offensive, I think the majority of stations are responsible broadcasters. Further, I do not think the FCC requiring broadcast stations to record their programming will be effective in curbing or catching indecency violations.

I have two fundamental objections to your proposed rulemaking. I do not believe it could be enforced or utilized for the purpose you intend, and it would be extremely expensive for small stations to implement.

I own and operate 1230AM and 93.3FM KVAK in Valdez, Alaska. Our town has a population of 4,300 and I take pride in the fact that I know and abide by the requirements imposed by the FCC. When it comes to what is appropriate to air on my radio stations I do not look to the FCC for guidance, I look to my community. The standards set by the community and by my sense of judgment are much more stringent than any regulation posed by the FCC. Therefore, the act of recording my programming would be a waste of my time and resources. Time and resources I could use to serve my community.

I know several small operators around the United States and their operation and sentiments are essentially the same. Your proposed rulemaking would provide a hardship for smaller operators and is an unnecessary safeguard. With only two full-time staff members and several part-time employees, I would have to hire someone to record programming or divert valuable hours from a current employee.

It's hard to comprehend such a small station, so let's do a little math. I have 80 hours a week of full-time help. I probably average another 40 hours per week of part-time help. That's a total of 120 hours per week or 480 per month. If it takes one hour per day to record programming, that's seven hours per week or 28 per month. That's more than five percent of my staff time allocated to recording programming that will, most likely, never be listened to. And programming that, if listened to, would sound like Romper Room next to the likes of Howard Stern.

Now let's equate time to money. If it took 28 hours per month to record programming and it cost me \$15 per hour (payroll and taxes) to employ someone to complete this task, the total cost to complete your requirement would be \$420 per month. Doesn't sound like much, but the average business in our small town spends \$231 per month on advertising. Our profit margin is roughly 35 percent, so we would have to acquire at least five new advertisers in order to cover the costs of implementing your proposed rulemaking.

The FCC's proposed rulemaking MB Docket No. 04-232 is not a good idea for many reasons. I thank you for taking the time to read my arguments and hope you will not require broadcast stations to record programming. I might suggest that if you insist on having stations record programming, that you require it of stations that have been found guilty of violating indecency standards.

Best Regards,

Laurie Prax